



Yitzchak Zelman <yzelman@marcuszelman.com>

Follow-Up on Outstanding Discovery Requests

1 message

Yitzchak Zelman <yzelman@marcuszelman.com>

Fri, Mar 3, 2023 at 12:20 PM

To: David Stein <dstein@steinllp.com>, "David M. Nieporent" <dnieporent@steinllp.com>

Good morning Mr. Stein,

As discussed on the phone just now, we still haven't received responses to the discovery requests served in the following cases:

1. Oriental Decor - requests served on November 21.
2. San Diego Trading - requests served on January 9.
3. Earth's Elements - requests served on December 6.
4. Mountain Woodcarvers - requests served on January 20.

Each of these requests were served well over 30 days ago, and we have received nothing. While I don't want to have to involve the Court, we will be filing the Motion to Compel unless these responses are served by March 13.

All the best,

Yitzchak.

--

Yitzchak Zelman, Esq.



O: (732) 695-3282

F: (732) 298-6256

E: yzelman@marcuszelman.com

W: www.marcuszelman.com

701 Cookman Avenue, Suite 300
Asbury Park, New Jersey 07712

CONFIDENTIALITY NOTICE: This communication (including any related attachments) may contain confidential and/or privileged material. Any unauthorized disclosure or use is prohibited. If you received this communication in error, please contact the sender immediately, and permanently delete the communication (including any related attachments) and permanently destroy any copies.

IRS CIRCULAR 230 NOTICE: To the extent that this message or any attachment concerns tax matters, it is not intended to be used and cannot be used by any taxpayer for the purpose of avoiding penalties that may be imposed by law.